



ROSELLI GRIEGEL LOZIER & LAZZARO, PC

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August 4, 2008

via facsimile and regular mail

Hon. Joel Schneider
U.S. Magistrate Judge
United States District Court, District of New Jersey Camden
Mitchell H. Cohen U.S. Courthouse, Room 2060
1 John F. Gerry Plz., Fourth & Cooper Sts.,
Camden, NJ 08101

RECEIVED

AUG 05 2008

JOEL SCHNEIDER
U.S. Magistrate Judge

re: Bayside State Prison Litigation

07cv5127(RBK)

Dear Judge Schneider:

This correspondence is being sent on behalf of Mark M. Roselli, Esq. Our office is in receipt of Your Honor's correspondence confirming the case status conference call held on July 21, 2008. It was Mr. Roselli's understanding that all parties agreed during that call that the bates numbers of only *medical* documentation to be used in cross-examining *incarcerated* plaintiffs need be identified and supplied to plaintiffs' counsel in advance of the hearings of August 14, 2008 and all subsequent hearings of *incarcerated* plaintiffs. Your Honor's July 22, 2008 correspondence seems to require that the bates numbers of *all* documentation to be used in cross-examining *all* plaintiffs be identified and supplied to plaintiffs' counsel in advance of their respective hearings. So that our office may comply with Your Honor's instructions, please provide clarification as to this issue.

Additionally, please be advised that our office has been unable to obtain the complete bates-stamped medical records of Kenneth Thurston, whose matter is to be heard on August 14, 2008. The medical documentation – if any – to be used in cross-examination of Mr. Thurston will be provided to plaintiffs' counsel upon our receipt and identification of the same.

Thank you for your attention to this matter. If you have any questions, please feel free to contact the undersigned.

So Ordered this 5th day
of August, 2008
Joel Schneider
JOEL SCHNEIDER, USMJ

Respectfully,
Roselli Griegel Lozier & Lazzaro, PC

Grant C. Wright, Esq.

MMR/gcw

cc: John Bissell, Special Master (facsimile and regular mail)
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